



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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SEP - 7 2006

Ref: 8EPR-N

Floyd Johnson
Bureau of Land Management
Price Field Office
125 S. 600 West
Price, Utah 84501

Re: Supplemental Information and Analysis to the
Draft Environmental Impact Statement for the Price
Field Office for Areas of Critical Environmental
Concern, Price, Utah CEQ #20060230

Dear Mr. Johnson:

The Environmental Protection Agency (EPA) Region VIII has reviewed the Supplemental Information and Analysis to the Draft Environmental Impact Statement (DEIS) for the Price Field Office Draft Resource Management Plan (RMP) for Areas of Critical Environmental Concern. The following comments are provided in accordance with our responsibilities and authorities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

EPA previously submitted comments on the Draft RMP and DEIS in a letter dated November 30, 2004. EPA is particularly interested in the cumulative impacts from all reasonably foreseeable development (RFD), air quality impact analysis including long-range protection of visibility, habitat impact analysis particularly from invasive non-native species, and mitigation for all resources which might be improved through curtailing activities during severe drought conditions.

The lands managed by the Price Field Office (PFO) include the unique pictographs of Nine Mile Canyon, Desolation Canyon of the Green River, the archeological treasures of Range Creek recently acquired by State of Utah, Labyrinth Canyon of the lower Green River, San Rafael Canyon and Reef, Segar's Hole, and Sid's Mountain. These lands include rivers with wild characteristics including the Green River, Range Creek, Rock Creek, Price River, San Rafael River, and Nine Mile Creek. This supplemental information adds further details on lands qualified as Areas of Critical Environmental Concern (ACECs), including additional lands within Desolation Canyon ACEC, Mussentuchit Badlands ACEC, and two potential ACEC areas known as White-tailed Prairie Dog and Lower Muddy Creek.

As EPA previously recommended in 2004, BLM should develop as part of Alternative C in the Final EIS a provision to lease lands with the No Surface Occupancy (NSO) lease for lands that qualify as ACECs. Imposing NSO stipulations can provide the maximum conservation and protection of natural resources from mineral and energy development. We recommend that BLM apply NSO lease stipulations consistent with Alternative C, because if the industry is capable of development using horizontal drilling technology, BLM could attain additional recovery of the oil and gas resources while providing increased protection of the natural resources in these nationally-unique canyon lands. On the other hand, if resource recovery using horizontal drilling techniques is not technically feasible, then BLM could remove the NSO stipulations at a later date following public review.

Drought conditions have affected native range conditions in the PFO to a considerable extent. Prolonged drought conditions stress native plant communities and favor non-native plant communities potentially more prone to fire. In the past, BLM has altered its management practices in Utah during prolonged drought such as removing cattle to protect conditions in grazing allotments. We suggest that the Final EIS consider various management techniques, including reducing vehicular access to protect natural resources during prolonged drought conditions especially within ACECs.

Weston Wilson of my staff has coordinated EPA's comments. He can be reached at the address above, by telephone at (303) 312-6562, or by e-mail at wilson.wes@epa.gov. Thank you in advance for considering our comments and concerns.

Sincerely,

A handwritten signature in dark ink, appearing to read "Larry Svoboda", with a stylized flourish underneath.

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection
and Remediation

cc: Laura Romin, FWS, Salt Lake City
Gilbert Hunt, Utah DNR, Salt Lake City
Harry Judd, Utah DEQ, Salt Lake City

